

May 25, 2004

U.S. Magistrate Judge David R. Homer
James T. Foley U.S. Courthouse
445 Broadway
Albany, New York 12207

Re: NXIVM Corporation, et al. v. The Ross Institute, et al.
Civil Action Nos. 03-CV-0976 and 03-CV-1051

Dear Magistrate Judge Homer:

Enclosed find the proposed Order resulting from the conference held May 25, 2004 allowing Tobin and Dempf, LLP and Kevin A. Luibrand, Esq., to withdraw as counsel to plaintiffs in connection with this action.

Thank you for your consideration

Very truly yours,

TOBIN and DEMPf, LLP

Kevin A. Luibrand

KAL:pm

cc: Arlen L. Olsen, Esq.
Thomas F. Gleason, Esq.
Linda Blom Johnson, Esq.
Anthony J. Sylvester, Esq.
Douglas M. Brooks, Esq.
Peter R. Osinoff, Esq.
Andrew M. Wargo, Esq.